



# Sierra Pacific Industries

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530-283-2820

November 25, 2015

Randal J. Gould, District Ranger  
Feather River Ranger District, Plumas National Forest  
875 Mitchell Ave  
Oroville, CA 95965

Re: Gibsonville Healthy Forest Restoration Project (Gibsonville Project)

Dear Randy;

Sierra Pacific Industries operates forest product manufacturing facilities (2 sawmills, 16 dry kilns, and 2 planers) and a biomass powered cogeneration plant, which together employ 302 wage-earners in Quincy, CA. Our manufacturing facilities, as well as our employees and contractors, local merchants, County agencies and the surrounding communities, rely on the direct and indirect income generated by the production and sale of forest products developed from forest management activities occurring on the Plumas, Lassen, Tahoe, and Toiyabe National Forests.

Lands managed by the USDA Forest Service (portions of the Plumas, Lassen, Toiyabe, and Tahoe National Forests) occupy approximately 70% of the land-base of Plumas County. However, these lands are tax exempt, or non-assessable, which means they do not contribute directly to the tax base as privately-owned properties do. As a result Plumas County is dependent on receipts generated through the sale of timber and other products from federal lands to provide this valuable revenue. Providing socioeconomic benefits, including the provision of a sustainable supply of timber, among other resources, is part of the mandate of the USDA Forest Service.

Data provided by the Census Bureau, Plumas County Board of Education, Plumas County Department of Public Works, and others, indicate that Plumas County's population and infrastructure decline, decline in the number of students in our schools (40% in the last decade), and reduced sales tax revenue, are correlated to the significant reduction, over the past three decades, in timber and other resources made available from National Forest lands.

One can make the argument that watershed, wildlife, and recreation values, among others, must be taken into consideration when managing Public forestlands. We agree wholeheartedly with this argument. In fact our position is that proper forest management can help conserve these values as well as promote and perpetuate local communities.

Sustainable forest management is simply defined as “not cutting more than you grow.” Available information shows that annual timber growth on the Plumas National Forest is considerably higher than what is being cut. And what is being cut is still less than what is dying (mortality). This suggests that there is a lot more that can be done across the landscape through proper forest management, which will help to improve forest health, enhance watersheds, benefit wildlife, reduce the threat of catastrophic wildfire, and generate income for local communities.

As stated in the Project Description the Purposes of the Project are to:

- Remove hazard trees from along roadways and within the Gibsonville townsite
- Thin vegetation to: increase visibility and protect the Gibsonville townsite; release aspen from conifer suppression; restore meadow potential zones
- Reduce ground, ladder, and crown fuels by thinning trees and brush
- Utilize removed material to create economic benefit locally and generate partial funding for noncommercial treatments
- Remove invasive plants from Project area

The Proposed Actions which follow the listing of the Purpose of the project show in detail the activities proposed to accomplish the necessary work.

Please consider the following comments concerning the proposed Gibsonville Project:

Sierra Pacific Industries supports the use of the Healthy Forest Restoration Act (HFRA) of 2003 to facilitate the environmental analysis authority provided in section 104 of Title 1. HFRA provides authorities the ability to expedite planning and effectively implement hazardous fuel reduction projects. We believe collaborative requirements within HFRA will engage concerned individuals in the initial stages of the Project and help its timely implementation. We encourage the Forest Service to use HFRA to make this a successful and economically feasible, commodity producing project.

The project should be economically feasible. To be considered economically feasible the product of the potential project (sawlogs and biomass) should be able to pay its way out of the woods. In other words, the product must have enough volume and value to cover the cost of cutting, skidding, processing, and shipping to the conversion facility. If work such as hand thinning and piling, mastication, jack-pot piling, road construction or reconstruction, restoration work, is to be completed, that work must also be covered by the value of the product. There is enough timber available within the scoping area to make this an economically feasible project if done prudently.

Improving forest health can be accomplished by thinning existing stands of timber across a broad distribution of diameter classes (dominants, co-dominants, and suppressed trees) and spacing residual trees in such a manner to reduce overall competition for sunlight, soil moisture, and nutrients. The process of “thinning from below” does not adequately treat a stand in which fire resiliency and watershed improvement are to be the outcome. Reducing canopy closure by modifying horizontal as well as vertical continuity of stands is crucial in creating healthy fire resistant stands. By thinning timber stands over a broad distribution of diameter classes, creating gaps across the landscape, and establishing more vigorous and fire-resilient stands, the likelihood of perpetuating stand replacing fires is diminished.

Enhancing watershed conditions including water quality and habitat for riparian and aquatic species can be accomplished through proper forest management. Creating healthy, fire resilient stands of timber will result in enhanced watershed conditions by diminishing the possibility of the landscape being devastated by catastrophic wildfire.

Aspen stands, which benefit from disturbance and provide forage for wildlife as well as cattle, also provide buffer strips necessary for functioning riparian habitat. By reducing conifer encroachment in aspen stands you are helping to perpetuate healthy riparian zones which will provide benefits to human and other biological populations.

A well maintained road system is beneficial for both resource protection and resource management. For this reason, the process of eliminating roads should be well thought out. Future forest management and continued fire suppression efforts will depend on a well maintained road system.

Respectfully submitted,

Jared J. Tappero, Division Forester